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November 18, 2006

Document Processing Desk (REGFEE)
Attn: Driss Benmhend
BPPD (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

SynTech Global, LLC
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 234-8550
Fax: (302) 234-7570

Dear Mr. Benmhend,

Re: KIN-Gro RTU, EPA File Symbol 82437-G
Resubmission in response to BPPD Letter of October 5, 2006

SynTech Global, as agent for K & W Agrichemicals, Inc. is responding to the referenced BPPD letter of October 5, 2006, copy attached.

Your letter indicates that in order for BPPD to register the referenced product we must:

(1) Submit information to show that the ingredients in the product are cleared for food uses.

I have revised the Confidential Statement of Formula for two inert chemical names. The changes reflect chemical name synonyms. All of the inert ingredients in the revised CSF are cleared under 40 CFR Part 180.910 or 180.920 (see attached highlighted pages from 40 CFR 180.910 and 180.920).

(2) Submit Tier I biochemical pesticide toxicology data for this product or submit a rationale and request for data waivers. Enclosed with this letter is a single volume containing a rationale and request that BPPD waive the requirement for acute toxicity studies for this product. A revised data matrix is also enclosed.

(3) Submit Tier I biochemical pesticide non-target organism data for this product or submit a rationale and request for data waivers. Please refer to the data requirement table in 40 CFR Part 158.690 (d) Nontarget organism, fate and expression data requirements. This table indicates that the test substance for all Tier I data for an end use product is the Technical Grade of the Active Ingredient (TGAI). 40 CFR Part 158.50 Formulators' exemption provides that an applicant for registration of an end-use product need not submit or cite any data that pertain to the safety of another registered pesticide product which is purchased by the applicant and used in the manufacture or formulation of the product for which registration is sought. Since K & W is purchasing an EPA registered source of each active ingredient in this product (see CSF), we are relying on the data submitted by the registrant of the registered TGAI contained in our product to satisfy the

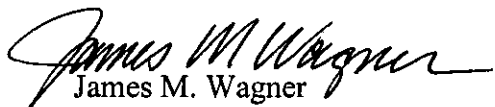
Tier I data requirements of Part 158.690(d). BPPD has previously accepted this explanation for the registration approved under EPA Reg. No. 82437-2 on July 28, 2006.

(4) Evidence of precision and accuracy for the analytical method should be obtained from analysis of samples with a concentration similar to that of the end use product. Product stability data is required.

It is requested that BPPD permit K&W to satisfy this requirement as a condition of registration approval along with storage stability. The analytical method is often developed as a prelude to generation of the storage stability data.

If you have any questions regarding this resubmission please contact me by telephone or email. Thanks for your assistance with this application.

Sincerely,



James M. Wagner
Agent for K & W Agrichemicals, Inc.
Tel: 302-234-8550
email: jwagner@syntechresearch.com

Enclosures

BPPD letter of October 5, 2006
Data Transmittal
Volume 1 of 1, Rationale and request for data waivers (3 copies)
40 CFR Part 180.910 and 180.920
Data Matrix (public and internal copy)
CSF (2 copies)

DATA TRANSMITTAL DOCUMENT

1. **Name and Address of Submitter**

K & W Agrichemicals Inc.
c/o SynTech Global LLC
P.O. Box 640
Hockessin, DE 19707

2. **Regulatory Action In Support Of Which This Package Is Submitted**

Resubmission for registration application for the product KIN-Gro RTU (Ready to Use) 82437-6

3. **Transmittal Date**


November 18, 2006

4. **List of Submitted Studies**

Vol. 1: Wagner, J. "KIN-Gro RTU Rationale and request for data waivers", K&W
48990001 Agrichemicals Inc., Nov 18, 2006, 7 pages.

Company Official:

James M. Wagner
Agent for K & W Agrichemicals Inc.
Name


Signature

Company Name: K & W Agrichemicals Inc.

Company Contact: James M. Wagner
Name

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